

FILED

MAR 25 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)

Plaintiff,)

V.)

ADAM JOHN ROBERT FARRAR,)

Defendant.)

4:15CR00132ERW/SPM

No.

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));

(b) "sexually explicit conduct" to mean actual or simulated

(i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6)).

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.

2. The "Internet" was, and is, a computer communications network using interstate and foreign telephone lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about January 1, 2014, and on or about March 16, 2015, in the Eastern District of Missouri, and elsewhere,

ADAM JOHN ROBERT FARRAR,

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a prepubescent minor female, I.F., to engage in sexually explicit conduct, specifically, defendant photographed and video recorded I.F. in a lascivious display of her genitals while I.F. was in a

bathtub, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., a Canon PowerShot 300 camera, GoPro camera, and a Toshiba External Hard Drive,

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about January 1, 2014, and on or about March 16, 2015, in the Eastern District of Missouri, and elsewhere,

ADAM JOHN ROBERT FARRAR,

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a prepubescent minor female, I.F., to engage in sexually explicit conduct, specifically, defendant video recorded I.F. in a lascivious display of her genitals while I.F. was wearing shorts, and said sexually explicit conduct was for the purpose of producing visual depictions of such conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., a Spy Gear camera and a 32GB USB drive, In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

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Assistant United States Attorney